

EXHIBIT L

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ONTARIO

----- X
LETICIA LEE :

Plaintiff, :
:

Index No. 134539-2022
Hon. Craig J. Doran
Motion Seq. No. 002

-against- :

**AFFIRMATION OF
ELIZABETH A. MCNAMARA
IN SUPPORT OF
DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

WARNER MEDIA LLC; HBO HOME
ENTERTAINMENT, INC.; WARNER BROS.
WORLDWIDE TELEVISION DISTRIBUTION,
INC.; NBCUNIVERSAL TELEVISION STUDIO
DIGITAL DEVELOPMENT LLC; CBS
BROADCASTING INC.; GRAMMNET NH
PRODUCTIONS :

Defendants. :
----- X

ONTARIO COUNTY CLERK'S OFFICE
FILED

DEC 29 2022

MATTHEW J. HOOSE, County Clerk
By _____
ACTING DEPUTY CLERK

Elizabeth A. McNamara affirms the following to be true under penalty of perjury pursuant to New York Civil Practice Law and Rules ("CPLR") § 2106.

1. I am a partner at the firm Davis Wright Tremaine LLP ("DWT"), and I am counsel for Defendants Warner Media LLC; HBO Home Entertainment, Inc.; Warner Bros. Worldwide Television Distribution, Inc.; NBCUniversal Television Studio Digital Development LLC; CBS Broadcasting Inc.; and Grammnet NH productions ("Defendants") in the above-captioned matter. I am duly admitted to practice law in the Courts of New York State.

2. I respectfully submit this Affirmation in support of Defendants' motion for a 30-day extension of time (until February 2, 2023) to respond to the Complaint of Plaintiff Leticia Lee.

3. This is Defendants' first request for an extension of time to respond to the Complaint.

4. Plaintiff served the Complaint in the above-captioned matter on at least some of the Defendants on or around December 13, 2022. The summons served by Plaintiff did not specify her email address. Plaintiff is proceeding pro se. In her Complaint, Plaintiff alleges that she created an original treatment and pilot script entitled *Girlfriends* in 1991 and claims that the popular shows *Living Single* (1993-1998), *Friends* (1994-2004), *Sex and the City* (1998-2004), and *Girlfriends* (2000-2008) all infringed her treatment and script. Compl. ¶ 1.

5. At my direction, my colleague contacted Plaintiff via telephone on December 19, 2022, informing her that DWT had been retained to represent Defendants and to request Plaintiff's consent to a 30-day extension of time for Defendants to respond to the Complaint. My colleague briefly spoke to Plaintiff on the telephone, who asked that Defendants submit their request via text message. Plaintiff declined to provide Defendants with her email address. That same day, my colleague requested via text message that Plaintiff consent to a 30-day extension of time until February 2, 2023, for Defendants to respond to the Complaint. Plaintiff did not respond to that message.

6. The next day, on December 20, 2022, at my direction, my colleague again called Plaintiff, who did not answer. My colleague then sent Plaintiff a text message at 11:04 A.M. that day, following up on the request and stating: "If we don't hear from you by close of business today, we will assume that you are fine with a 30-day extension of time for the defendants to respond to the complaint, meaning we will file a response by February 2, 2023. Let me know if you do not consent." As of this filing, Plaintiff has not responded to that message. Accordingly, Defendants understand that Plaintiff consents to Defendants' request for a 30-day extension to respond to the Complaint.


7. As such, pursuant to CPLR § 2004, Defendants respectfully request that the Court grant a 30-day extension of time for Defendants to respond to the Complaint, until February 2, 2023. Defendants

have only recently received the complaint, and request this extension to allow more time to fully assess all relevant information and claims to be able to respond accordingly.

8. A proposed order for such extension is attached to this filing, for this Court's consideration.

Dated: New York, New York
December 22, 2022

Respectfully submitted,
Davis Wright Tremaine LLP

By: 
Elizabeth A. McNamara (N.Y. Bar No. 1930643)
1251 Avenue of the Americas, 21st Floor
New York, New York 10020
Telephone: (212) 603-6437
lizmcnamara@dwt.com

Attorney for Defendants

Copies To:
LeTicia Lee
1335 Jefferson Rd #20711
Rochester, NY 14602
Pro Se Plaintiff (via first-class mail)